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UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re: : CHAPTER 11

RML, LLC¹ : Case. No. 22-10784 (DSJ)

:

Reorganized Debtor

:

Tax I.D. No. N/A

SUPPLEMENTAL DECLARATION OF CHAILLE BROWN IN SUPPORT OF MOTION OF TINUITI, INC. FOR ALLOWANCE AND IMMEDIATE PAYMENT OF ADMINISTRATIVE EXPENSE CLAIM PURSUANT TO 11 U.S.C. §§ 503(a) AND (b)(1)(A)

- I, Chaille Brown, the Chief Financial Officer of Tinuiti, Inc. ("Tinuiti"), hereby declare and certify as follows:
- 1. I am the Chief Financial Officer of Tinuiti and have personal knowledge of the facts stated herein.

¹ On May 30, 2023, the Court entered the Order (I) Consolidating Remaining Matters Under the Remaining Case, (II) Entering Final Decree Closing Certain of the Chapter 11 Cases, (III) Changing the Case Caption of the Remaining Case, and (IV) Granting Related Relief [Docket No. 1920], closing the affiliated chapter 11 cases and directing that all motions, notices, and other pleadings related to any of the affiliated debtors be filed inthis case. The location of RML, LLC's service address for purposes of these Chapter 11 Cases is: 55 Water St., 43rd Floor, New York, NY 10041-0004.

- 2. Tinuiti is a is a digital marketing agency offering a broad range of services, including Paid Search, Shoppable Media, Paid Social, Display, Insights & Analytics, and beyond.
- 3. Tinuiti provided such services to Revlon, Inc. and Revlon Consumer Products Corporation, among other debtors (the "Debtors") both before and after the petition date, June 15, 2022 (the "Petition Date").
- 4. The purpose of this supplemental declaration is to update the Court on the status of the Motion of Tinuiti for allowance and immediate payment of administrative expense claim pursuant to 11 U.S.C. § 503(a) and (b)(1)(A) (the "Motion")² and to provide further support for the request for payment of the May Invoices, which have now been generated.
- 5. As of the date of this Supplemental Declaration, the April Invoices have been paid in full by the Debtors and Tinuiti hereby withdraws its request for allowance and immediate payment of the April Invoices.
- 6. On or about June 8, 2023, Tinuiti generated the May Invoices which are broken down as follows:

Invoice No.	Date	Due Date	Amount	Services
INV62156	5/31/23	7/15/23	\$35,000.00	May 2023 Media Fees
INV62165	5/31/23	7/15/23	\$14,565.75	May 2023 Media Fees
INV62258	5/31/23	7/15/23	\$33,797.49	May 2023 Affiliate Fees
	1	<u> </u>	\$ <u>83,363.24</u>	

True and correct copies of the May Invoices are attached as Exhibit "J" hereto.

7. On the day the May Invoices were generated, they were promptly delivered to the Debtors' counsel electronically.

² Unless otherwise defined herein, capitalized terms used in this Supplemental Declaration shall have the meaning ascribed to them in the Motion.

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8. The Debtors have not made payment on the May Invoices.

9. The Debtors' failure to make payment of the May Invoices has harmed Tinuiti in

the amount of \$83,363.24 plus any and all related costs, expenses, and fees.

10. While the May Invoices are not due until July 15, 2023, Tinuiti files the Motion

and this Supplemental Declaration out of an abundance of caution, as the May Invoices are due

after the June 1, 2023 bar date for filing motions for approval of administrative expenses.

11. I certify that, to the best of my knowledge, the foregoing is true and accurate under

penalty of perjury.

/s/Chaille Brown

CHAILLE BROWN
CHIEF FINANCIAL OFFICER
TINUITI INC.

Dated: _____